

## REMARKS

In the July 2, 2004 Office Action, the Examiner noted that claims 1-11 were pending in the application; rejected claims 2-10 under the second paragraph of 35 USC § 112; and rejected claims 1, 2 and 11 under 35 USC § 102(e) as anticipated by U.S. Patent 6,148,312 to Paik et al. (Reference A). Claim 12 has been added and thus, claims 1-12 remain in the case. The Examiner's rejections are traversed below.

### The Application

The application is directed to unifying pieces of data which represent a fact by correcting and standardizing errors and contradictions existing in data extracted from a text irrespective of whether the errors and contradictions are contained in the text or arise in the process of extracting the data from the text.

### The Prior Art: U.S. Patent 6,148,312 to Paik et al.

The Paik et al. patent is directed to a system for electronic article maintenance and deletion. As illustrated in Fig. 4, contents of existing articles and metadata are examined to determine whether metadata exists for the articles and if not, metadata is created. If articles do not exist corresponding to the metadata, the metadata is deleted. This maintains a match between the metadata and the articles stored in the system.

### Rejections under 35 USC § 112, Second Paragraph

On page 2 of the Office Action, claims 2-10 were rejected under the second paragraph of 35 USC § 112 for indefiniteness. Claims 2, 3, 6, 9 and 10 have been amended in response to the comments in the rejection. If these changes are insufficient to overcome the rejection, the Examiner is respectfully requested to contact the undersigned by telephone prior to issuing another Office Action to arrange an Examiner Interview for the purpose of discussing what further amendments are required.

### Rejections under 35 USC § 102(e)

On pages 3 and 4 of the Office Action, the Examiner rejected claims 1, 2 and 11 under 35 USC § 102(e) as anticipated by Paik et al. In making this rejection, it was asserted that "detecting an inconsistent data group which could not be consistent by scanning an aggregated data set" (claim 1, lines 7-8) was disclosed by step 408 in Fig. 4 of Paik et al. because the term "inconsistent data group" was interpreted as "metadata that lacks an associated article of infor-

mation" (Office Action, page 3, lines 14-15). It is submitted that this interpretation of the phrase "inconsistent data group" is inappropriate, given the operations recited as being performed in claim 1, as well as the use of this term in the specification. It should have been clear from the original language of claim 1, as interpreted in light of the specification, that the "aggregated data set" (claim 1, line 8) is formed of extracted fact data, not a combination of extracted fact data and text as taught by Paik et al. To prevent this misinterpretation of the claims, claim 1 has been amended to clarify that the aggregated data set operated on by the detecting operation is produced by the aggregating "extracted fact data" (claim 1, lines 5-6). If this change is insufficient to cause withdrawal of the rejection of claim 1 under 35 USC § 102(e), the Examiner is respectfully requested to contact the undersigned by telephone prior to issuing another Office Action to arrange an Examiner Interview to discuss what further changes are needed to prevent misinterpretation of the claims.

The amendments made to claim 2 in response to the rejection under the second paragraph of 35 USC § 112 include clarification that the aggregating operation performed by the data aggregating unit puts "fact data ... into at least one data set" (claim 2, lines 5-6). Claim 2 already stated that the inconsistency detecting unit operates on "a data set aggregated by said data aggregating unit" (claim 2, line 8). It is submitted that the term "data set" as used in claim 2 and the specification is inconsistent with an interpretation that includes "articles" as part of the data set. It should be clear from the language used in claim 2, as interpreted in light of the specification, that the inconsistency detecting unit, correctness/incorrectness determining unit and final data integrating unit operate on fact data extracted from a text by the data extracting unit and aggregated by the data aggregating unit, instead of comparing metadata with text from which it was extracted, as taught by Paik et al.

For the reasons set forth above, it is submitted that claim 2 patentably distinguishes over Paik et al. If this rejection is not withdrawn, the Examiner is respectfully requested to contact the undersigned prior to issuing another Office Action to arrange an Examiner Interview to discuss what further amendments are necessary to avoid misinterpretation of claim 2.

Claim 11 has been amended in a different manner than claims 1 and 2 to define the term "aggregated data set" which is recited as being scanned to detect an inconsistent data group. It is submitted that Paik et al. does not teach or suggest "aggregating the extracted fact data throughout the text into at least one aggregated data set" (claim 11, lines 7-8). Therefore, it is submitted that claim 11 patentably distinguishes over Paik et al. If the rejection is not withdrawn,

the Examiner is respectfully requested to contact the undersigned by telephone to arrange an Examiner Interview for the purpose of discussing what further amendments are needed.

#### New Claim 12

Claim 12 has been added to recite a method according to the present invention that clearly is not anticipated or made obvious by the method disclosed by Paik et al. As discussed above, Paik et al. does not teach or suggest most of the operations recited in claim 12, including "scanning only the grouped fact data" (claim 12, line 6). If the Examiner believes that claim 12 can be interpreted as performing operations disclosed by Paik et al. or that would be obvious therefrom, the Examiner is respectfully requested to contact the undersigned by telephone to arrange an Examiner Interview prior to issuing another Office Action.

#### Summary

It is submitted that Paik et al. does not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 1-12 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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